

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)
v.)
Plaintiff,) No. 3:23-cv-00243
SOUTHERN BAPTIST CONVENTION;) JUDGE CAMPBELL
GUIDEPOST SOLUTIONS LLC; and) MAGISTRATE JUDGE FRENSELY
EXECUTIVE COMMITTEE OF THE) JURY DEMAND
SOUTHERN BAPTIST CONVENTION,)
Defendants.)

AMENDED 30(b)(6) NOTICE OF DEPOSITION OF GUIDEPOST SOLUTIONS LLC

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff will take the deposition of a representative by oral examination of **GUIDEPOST SOLUTIONS LLC** (“Guidepost”) at **Veritext Legal Solutions, 1250 I Street NW, Suite 901, Washington, DC 20005** on **February 26, 2024**. The deposition will commence at **1:00pm Eastern Time** and will continue day-to-day until completed.

The deposition will be transcribed by a court reporter, may be videotaped, and will continue day-to-day until completed. Counsel are invited to attend and cross-examine. Guidepost shall designate one or more officers, directors, managing agents, executive officers, or other persons duly authorized and consenting to testify on its behalf on the topics below. No later than three (3) business days prior to the deposition, Guidepost shall identify the person(s) who will testify on its behalf pursuant to this notice and the matter(s) about which each person will testify.

Definitions

1. “Guidepost,” “you,” and “your” refers to Guidepost Solutions LLC and its respective successors or predecessors in interest, parents, subsidiaries, divisions, affiliates, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

2. “Johnny Hunt” refers to Plaintiff Johnny M. Hunt.

3. “Complaint” refers to the Complaint in this matter and any subsequent amendments.

4. “Report” refers to the “Report of the Independent Investigation, The Southern Baptist Convention Executive Committee’s Response to Sexual Abuse Allegations and an Audit of the Procedures and Actions of the Credentials Committee” and any versions or drafts of the same.

5. “Complainant” refers to the woman mentioned in the Report who made allegations against Plaintiff.

6. “SBC” means Defendant Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

7. “Executive Committee” means Defendant Executive Committee of the Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons

(including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

8. “Task Force” means the SBC Task Force as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

9. “Cooperation Committee” means the Committee on Cooperation of the Executive Committee as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

Topics

1. The engagement and retention of Guidepost for the Report, including the events that led to the need for an investigation, the scope work under the engagement letter, and approval process for the Report.
2. Allegations of abuse committed by Executive Committee members discovered by Guidepost before May 22, 2022 that were not previously identified to or known by the Southern Baptist Convention or Executive Committee.
3. Guidepost's organizational structure for the years 2020-2024.
4. The total amount of time billed by each Guidepost employee or independent contractor for work on the Report, for the portion of the Report related to Plaintiff, and the total amount of money that Guidepost was paid for that work.
5. Guidepost's financial statements for the years 2020, 2021, 2022, and 2023 including its balance sheets, income statements, cash flow statements, and its statements of changes in financial position.
6. Guidepost's organizational changes since publication of the Report, including new hires, the creation of new divisions, any expansion of existing divisions, and new engagements with the SBC or Executive Committee.
7. The marketing, advertising, and promotional efforts by Guidepost associated with the Report, including weekly updates, press releases, social media posts, interviews, announcements, website banners, links, both prior to and after publication of the Report.
8. Prior to and after publication of the Report:
 - a. The total number of clicks, views, and overall engagement on links and banners on Guidepost's website relating to the Report.
 - b. The total number of clicks, views, shares, likes, comments, and engagements on any social media posts pertaining to the Report.
9. Changes to positions, roles, titles, or compensation of anyone associated with Guidepost who worked on the Report after the Report was published.
10. All interviews conducted by anyone associated with Guidepost or participated in by anyone associated with Guidepost regarding this Report or subsequent engagements with the SBC or Executive Committee.

11. All communications with anyone associated with the Executive Committee, the SBC, the Task Force, and the Cooperation Committee relating to the Report and the portion of the Report relating to Plaintiff.
12. All edits, comments, suggestions, and feedback received from anyone associated with the Executive Committee, the SBC, the Task Force, and the Cooperation Committee relating to the Report and the portion of the Report relating to Plaintiff.
13. Text messages exchanged or received by Guidepost employees or independent contractors relating to the Report.

FURTHERMORE, in accordance with Rules 30(b)(2) and 34 of the Federal Rules of Civil Procedure, Plaintiff requests that the witness bring the following documents to the deposition, or that counsel produce the same electronically to Patrick Sanders of MacGill PC on or prior to 5:00pm Eastern Time on February 23, 2024.

- **REQUEST NO. 1:** Documents showing Guidepost's organizational structure for 2020, 2021, 2022, 2023, and 2024.
- **REQUEST NO. 2:** Guidepost's financial statements for 2020-2023 including its balance sheets, income statements, cash flow statements, and statements of changes in financial position.
- **REQUEST NO. 3:** All documents pertaining to the amount of time billed by Guidepost for work on the Report, for time billed on the portions of the Report relating to Plaintiff, and the total amount of money that Guidepost was paid for that work.
- **REQUEST NO. 4:** All documents pertaining to engagements entered into by Guidepost each month in 2020, 2021, 2022, and 2023.
- **REQUEST NO. 5:** All documents relating to any advertising, marketing, or promotional efforts by Guidepost pertaining to the Report, including third-party inquiries related to the Report.
- **REQUEST NO. 6:** All documents pertaining to changes in positions, roles, titles, or pay of anyone associated with Guidepost who worked on the portions of the Report regarding Plaintiff.

Dated: February 12, 2024

/s/ Robert D. MacGill

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on February 12, 2024, on the following counsel via email only:

/s/ Patrick J. Sanders
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